



January 26, 2023

Mr. Rob Kondreck
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Emergency Contingency Plan – Revision 0
Nelson Knitting Site - RV
Rockford, Winnebago County, Illinois
EPA Contract Number: 68-HE-0519-D0005
Task Order-Task Order Line Item Number (TO-TOLIN): F0032-0001DL101
Document Tracking Number: 1587

Dear Mr. Kondreck:

The Tetra Tech, Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) hereby submits this emergency contingency plan (ECP) for the Nelson Knitting Site (the Site) in Rockford, Winnebago County, Illinois. This plan summarizes the emergency contingency protocols established for site activities, which begin on January 30, 2023.

Please call me at (312) 201-7763 or email me at Alexis.Enright@tetratech.com if you have any questions or comments regarding this submittal.

Respectfully,

A handwritten signature in black ink, appearing to read 'Alexis Enright'.

Alexis Enright
Project Manager

Enclosure

cc: TO-TOLIN file
 Karl Schultz, Tetra Tech Program Manager
 Kris Schnoes, Tetra Tech Quality Assurance Manager

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EMERGENCY CONTINGENCY PLAN

NELSON KNITTING SITE - RV

ROCKFORD, WINNEBAGO COUNTY, ILLINOIS

Revision 0
January 26, 2023

Prepared for:



U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Submitted by:



Tetra Tech, Inc. Superfund Technical Assessment and Response Team
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Chicago, IL 60606

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1. INTRODUCTION

The U.S. Environmental Protection Agency (EPA) contracted the Tetra Tech, Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) to support the removal of asbestos-containing material (ACM) and hazardous waste at a vacant, three-story manufacturing building that was formerly owned by Nelson Knitting Company, known as the Nelson Knitting Site (the Site). In response, START has prepared this emergency contingency plan (ECP) for use during the removal action.

This ECP outlines protocols for responding to potential incidents at the Site during the removal action. Specifically, it contains the following:

- Site background information (Section 2)
- A description of the project (Section 3)
- Emergency contingency protocols (Section 4)
- Additional information (Section 5)
- A reference list for work cited in this report (Section 6)

For further reference, local, state, and federal contacts are listed in Appendix A, Site figures are presented in Appendix B, and a map of the hospital route map is presented in Appendix C. Additionally, a copy of this ECP will be available at the command post at 427 Kent Street in Rockford, Illinois.

2. SITE BACKGROUND

This section describes the site location, site background information, and rationale for the planned removal activities.

2.1. SITE LOCATION

The Site is at 909 South Main Street in Rockford, Illinois. The approximate geographic coordinates of the facility are 42.263771 degrees north and 89.101911 degrees west, as measured at the approximate center of the property. The Site is in a mixed-use area of Rockford, Illinois, and is surrounded by commercial, residential, and vacant properties (Appendix B, Figures 1 and 2).

During the activities planned for this removal action, the command post and staging area will be located at 427 Kent Street, Rockford, Illinois.

2.2. SITE DESCRIPTION

The Site, which is approximately 1.5 acres, contains a three-story manufacturing building formerly owned by the Nelson Knitting Company and operated as a sock knitting mill until approximately 1990. Since 1990, the building has been vacant and is deteriorating.

During a Phase I Environmental Site Assessment (ESA) update prepared by Fehr-Graham & Associates (FGA) in 2009 for the City of Rockford, suspected ACM was observed on piping, steam pipe elbows, and boilers within the building. Suspected lead-based paint (LBP) was present throughout the building as well. Other materials were also observed in the building, including containers of chemicals, mercury-containing fluorescent lamps, and suspected polychlorinated biphenyl (PCB)-containing fluorescent lamp ballasts and electrical capacitors. The FGA Phase I ESA also included Sanborn maps from 1950 and 1951, indicating the building was constructed of fireproof materials and was expected to contain sheetrock and poured asbestos (FGA 2009).

On June 25, 2020, the City of Rockford determined that the entrance to the Site was compromised. An inspection of the building found that the boilers and other steel products had been removed. Suspected ACM materials from the boilers and pipes were found discarded in piles on the floor, as well as in garbage bags and fiber drums. The roof was also observed to be failing in multiple locations (City of Rockford 2020).

On June 26, 2020, the City of Rockford condemned and secured the property (City of Rockford 2020) and contacted the EPA Emergency Response Branch to request assistance with the Site on June 29, 2020.

On September 18, 2020, EPA issued Task Order Line Item Number (TOLIN) 0001BI104 to START to perform a Removal Site Evaluation (RSE) at the Site to (1) determine the risks posed to human health and the environment through potential exposure to ACM and hazardous waste; and (2) determine if a removal action by EPA was warranted. On October 8, 2020, EPA and START collected samples, including one sample containing ash, one liquid sample from the sump, two paint samples, seven bulk asbestos samples, one ballast sample, and eleven air samples.

Results from this investigation indicated that three of the seven bulk asbestos samples were friable and contained either chrysotile or amosite asbestos at concentrations ranging from 50 percent to 70 percent. Air sample results indicated that fibers matching asbestos characteristics were detected in the boiler room and east access point air samples. Action levels were also exceeded for PCBs in the light ballast sample and lead in the ash sample, sump sample, and one paint sample (Tetra Tech 2020).

Based on the observations during the site assessment and the analytical results of the samples containing hazardous material above applicable action levels, START recommended removal of the hazardous materials before the building could be considered safe to enter without personal protective equipment (PPE). This recommendation was based on evidence of trespassing into the building, which contains dry, friable, and severely compromised ACM. ACM in a compromised state does not need significant disturbance to result in concentrations of asbestos fibers in the air throughout the building to be above the Occupational Safety and Health Administration (OSHA) permissible exposure limits (PEL) (Tetra Tech 2020).

Site conditions and the presence of friable ACM and hazardous materials, including PCB lighting ballasts, lead-acid batteries, miscellaneous chemicals, mercury switches, and fluorescent tubes, at the Site pose a potential threat to both human health and the environment and meet the criteria of a removal action, as defined under Title 40 *Code of Federal Regulations* (40 CFR), Section 300.415(b)(2) (EPA 2022).

3. PROJECT DESCRIPTION

This section describes project activities, hours of operation and command post location, and coordination with local authorities.

3.1. PROJECT ACTIVITIES

EPA plans to undertake the following actions related to the cleanup of the facility:

- Develop and implement a site-specific Health and Safety Plan, ECP, and Air Monitoring/Sampling Plan and develop measures to control ACM dust during the removal
- Develop and implement a site-specific Security Plan
- Delineate the extent of all solid waste materials that may be found on the Site and delineate and determine the extent of asbestos found at the Site
- Characterize and segregate, when possible, ACM waste from non-ACM waste
- Load, transport, and dispose of ACM, hazardous substances, pollutants, ACM-impacted wastes, or contaminants at an EPA-approved disposal facility in accordance with the EPA Off-site Rule (40 CFR § 300.440)
- Take other response actions to address any release or threatened release of a hazardous substance, pollutant, or contaminant that the EPA On-Scene Coordinator (OSC) determines may pose an imminent and substantial endangerment to the public health or the environment

3.2. HOURS OF OPERATION AND COMMAND POST LOCATION

When the removal action begins, EPA and EPA contractors will be onsite from Monday through Friday from 0700 to 1700 hours. Work on the weekends is at the discretion of EPA. The command post and staging area for this removal action will be at 427 Kent Street, Rockford, Winnebago County, Illinois.

3.3. COORDINATION WITH AUTHORITIES

Local authorities have been notified of the planned removal activities taking place at the Site, and copies of this emergency contingency plan will be provided to them prior to removal activities.

4. EMERGENCY CONTINGENCY PROTOCOLS

During site removal activities, the following events will require a response by local emergency authorities:

- Spills control and containment
- Vandalism or trespass
- The presence of an active shooter
- Medical emergencies
- Fires or explosions

Protocols for addressing these events are described in the sections below, as is a description of the work area and muster point.

4.1. SPILL CONTROL AND CONTAINMENT

In the event of a spill or release, only trained personnel should ensure safety by assessing the situation and performing containment and control measures as appropriate. If the event is onsite, operations will cease, and a designated suppression team will assemble upwind of the event. All non-essential personnel in the area will meet at the designated muster point location described in Section 4.6.

The designated site safety officer (SSO) will attempt to identify the nature and extent of the release based on the safety data sheet (SDS), waste profile, available site data, or direct-reading instruments. The SSO or Emergency Rapid Response Services (ERRS) response manager (RM) will direct the suppression crew in making the necessary attempts to stop the release and initiate cleanup operations. Operations will remain suspended until the incident is stabilized and no longer poses a threat to personnel, the public, or the environment.

In addition to the hazardous materials at the Site subject to the removal activities, hazardous materials brought onsite may include fuels and other petroleum liquids associated with the heavy equipment to be used during site activities. The onsite fuel tank will be staged in the support area and clearly labeled. Fuel containers will be stored in secondary plastic containers or within a Visqueen-lined, bermed area designed to contain a spill. Spill containment materials (sorbent booms and pads) will be stored onsite to be readily available to contain spills that may occur. Any

disposable sampling equipment, personal protective equipment, and investigation-derived waste (IDW) will be double bagged for disposal as dry industrial waste.

The following equipment will be located on the Site:

- First aid kit(s)
- Emergency eyewash station(s)
- ABC fire extinguishers
- Chemical sorbent pads and/or boom(s)
- Portable air horns
- Portable radios and/or cell phones

Used materials will be properly contained, characterized, and disposed of. Fire suppression equipment will be staged in proximity to flammable materials in the prevailing upwind direction. Equipment will also be staged and readily available in the work areas as the field activities progress across the Site. This equipment is intended for use only on small, contained fires or to allow for safe egress from the area.

4.2. VANDALISM OR TRESPASS

Trespassers should be asked to leave work areas, and the local police should be notified if the trespassers fail to comply. If trespassers enter work areas, work should immediately cease, workers should exit the area, and the EPA OSC should be notified. Work should not restart until the trespassers have left the Site. The police should not enter work areas to apprehend an offender unless the work area has been cleared for safe entry by the EPA OSC.

EPA has requested that local police monitor the Site when EPA crews are not present. EPA has also notified the surrounding residents through public outreach of proposed activities. Residents noticing suspicious activities will contact the police. A copy of this emergency contingency plan will be available at the site trailer.

4.3. ACTIVE SHOOTER

If active shooters enter work areas, work should immediately cease, and workers should exit the area if possible. If evacuation is not possible, workers should attempt to hide from the view of the shooters, shield themselves from possible shots fired (e.g., closing and locking doors, turning off lights, and hiding behind large objects), and remain quiet. When safe to do so, workers should

call 911. The caller should identify the location, number, and physical description of the shooters. Workers will wait until law enforcement stops the active shooters and will follow the instructions of the responding officers until the situation is safe.

4.4. MEDICAL EMERGENCIES

Rescue operations at the Site property, if necessary, should be conducted by personnel wearing Level D PPE with disposable latex booties. Booties and other PPE will be available for local responders at the EPA command post. The victim should be decontaminated to the maximum extent possible, paying attention to the areas of the body or clothing that were in contact with contaminants or the ground. If the injury is minor, a full decontamination should be completed, with first aid administered prior to transport. If the victim's condition is serious, emergency decontamination should be completed at a minimum. If possible, decontamination and removal of injured personnel from the exclusion zone will be conducted prior to arrival of emergency medical services (EMS) workers. EMS workers will pick up injured personnel at the command post.

Workers on the Site should call 911 for emergencies requiring transport to a hospital. Depending on the injuries, the victim may be transported to SwedishAmerican Hospital Emergency Department, which is 1.9 miles from the Site. A hospital map showing directions to the hospital from the center of the Site is included in Appendix C. The facility's contact information is listed below:

SwedishAmerican Emergency Department
1401 East State Street, Rockford, IL 61104
(779) 696-2430

4.5. FIRE OR EXPLOSION

If a small fire occurs, onsite personnel will utilize suppression equipment (e.g., fire extinguishers, nearby water sources, etc.) to contain and ultimately extinguish the fire. Work activities will be temporarily halted to directly address this issue and ensure all safety protocols are maintained. Only once the fire has been fully extinguished can work activities resume if it is deemed safe.

The Rockford Fire Department dispatcher will be notified via 911 call to activate fire department resources. The caller should confirm that the Site is in Rockford, Illinois, and provide the Site

address. In addition, EPA OSC Robert Kondreck and the ERRS RM should be contacted by mobile phone at the numbers listed in Appendix A.

Law enforcement will control perimeter access during a hazardous materials incident. Typically, law enforcement officers are not equipped with protective clothing, and their main function will be site control and preventing unauthorized persons from entering the hazardous area. Law enforcement should not enter the exclusion zone unless they are trained and wearing appropriate PPE.

When called to the scene of a hazardous materials emergency, the fire department has the duty and responsibility to save lives, prevent injuries, reduce property loss, and restore vital services. Command of the emergency will be established by the officer of the fire company that first arrives. The command will be transferred using fire department staff under the incident command system. The fire chief will oversee the incident until he or she relinquishes that authority.

In the event of heavy smoke or toxic gas emissions, the fire department may initiate “shelter-in-place” in the neighboring areas. Tetra Tech will be available to assist with perimeter air monitoring.

4.6. MUSTER POINT AND EVACUATION PROCEDURES

The following muster point will be used based on the work area for the Site (Appendix B, Figure 2):

Table 1 — Muster Point and Work Area

Work Area	Muster Point Location
909 South Main Street	Site trailer located near 427 Kent Street

All personnel at the Site will be briefed on these and all emergency procedures as part of the initial safety briefing.

If an emergency necessitates evacuation of the Site, the following procedure will be followed:

1. Hand signals, audible communication, and an evacuation alarm of three blasts on an airhorn will notify personnel to evacuate the Site immediately.
2. All personnel will evacuate to the closest exit upwind of onsite activities. Personnel will then assemble at the predesignated muster point.
3. Personnel will remain at the muster point until an all-clear signal (that is, a single, long airhorn blast) is sounded or an authorized individual provides further instructions.

Personnel who should be contacted in the event of an incident are listed in Table 2:

Table 2 — Incident Contact Personnel

Name	Organization	Role
Robert Kondreck	EPA Region 5	EPA On-Scene Coordinator (OSC)
Chris Long	Environmental Quality Management, Inc.	EPA ERRS Contractor
Alexis Enright	Tetra Tech, Inc.	EPA START Contractor

Notes:

EPA U.S. Environmental Protection Agency
ERRS Emergency Rapid Response Services
START Superfund Technical Assessment and Response Team

In the event of heavy smoke or toxic gas emissions, the fire department may initiate a “shelter in place” declaration for the neighboring areas. If this is necessary, protocol should proceed according to current Winnebago County guidelines. Limited air monitoring equipment is available at the Site; however, EPA’s response resources will be made available if required, though they are largely located in Chicago, approximately 1.5 hours away.

5. ADDITIONAL INFORMATION

Additional information can be found at response.epa.gov/NelsonKnitting.

6. REFERENCE LIST

- City of Rockford. 2020. E-mail. *Nelson Knitting – 909 S Main St, Rockford, IL*. From: Robert Wilhelmi, City of Rockford. To: Ramon Mendoza, EPA. June 29.
- Fehr-Graham & Associates (FGA). 2009. Phase I Environmental Site Assessment Update and Phase II Environmental Site Assessment, Former Nelson Knitting Mills. July 9.
- Tetra Tech. 2020. "Removal Site Evaluation Report Revision No. 2." Prepared for EPA under Contract No. 68-HE-0519-D0005. December.
- U.S. Environmental Protection Agency (EPA). 2022. "Action Memorandum - Request for Approval and Funding of a Time-Critical Removal Action at the Nelson Knitting Site, Rockford, Winnebago County, Illinois (Site ID # C5RT)." November.

APPENDIX A. LIST OF CONTACTS

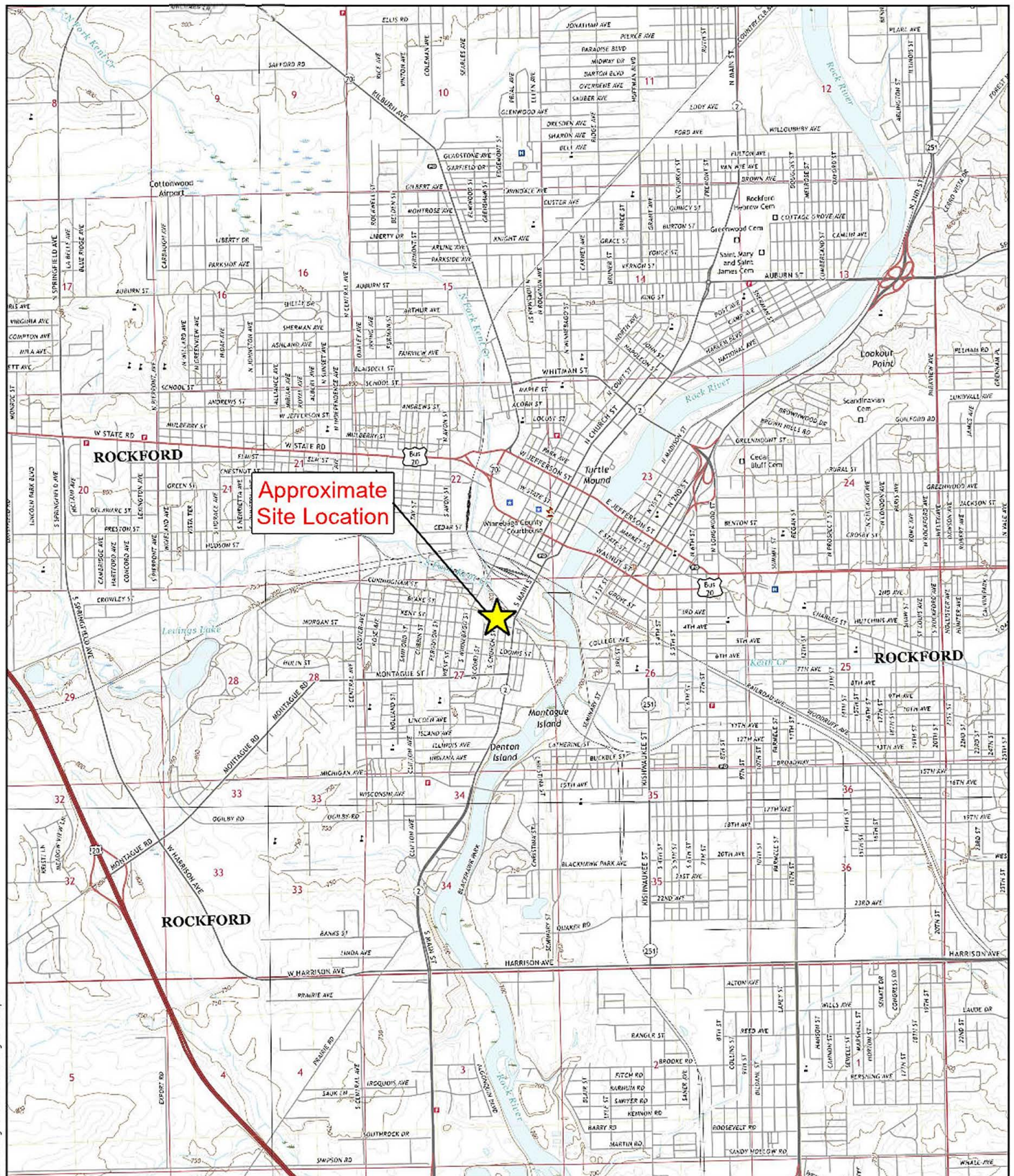
Agency/Representative	Contact	Phone
Local		
Rockford Fire Department and Emergency Service Disaster Agency	General Number	(779) 348-7171 or 911
Rockford Police Department (District 1 Station)	General Number	(815) 966-2900 or 911
Winnebago County Health Department	General Number	(815) 720-4000
State		
Illinois Environmental Protection Agency	24-hr Spill Reporting	(217) 782-3637
Illinois Emergency Management Agency	24-hr Spill Reporting	(800) 782-7860
Illinois Department of Public Health	General Number	(217) 782-7860
Federal		
U.S. Environmental Protection Agency On- Scene Coordinator (EPA OSC)	Robert Kondreck	(312) 758-6517
EPA	Region 5 Spill Line	(312) 353-2318
National Spill Response Center	24-hr Spill Reporting	(800) 424-8802
EPA Emergency Rapid Response Services (ERRS) Contractor (Environmental Quality Management, Inc.)	Chris Long	██████████
EPA Superfund Technical Assessment and Response Team (START) Contractor (Tetra Tech, Inc.) – Program Manager	Karl Schultz	██████████
EPA START Contractor (Tetra Tech, Inc.) – Project Manager	Alexis Enright	██████████
EPA START Contractor (Tetra Tech, Inc.) – Field Staff	Daniel Higley	(630) 746-2587

APPENDIX B. FIGURES

Figure 1 — Site Location Map

Figure 2 — Site Layout Map

APPENDIX C. EMERGENCY HOSPITAL ROUTE MAP

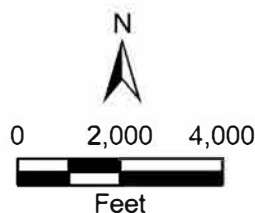


Reference Map



Legend

★ Approximate Site Location



Source: USGS Winnebago, IL, 7.5 Minute Topo Quad, 2021
USGS Rockford, IL, 7.5 Minute Topo Quad, 2021
USGS Rockford, IL, 7.5 Minute Topo Quad, 2021
USGS Rockford, IL, 7.5 Minute Topo Quad, 2021

Nelson Knitting Site - RV
909 South Main Street
Rockford, Winnebago County, Illinois

Figure 1
Site Location Map



Prepared For: US EPA

Prepared By: Tetra Tech, Inc.

Date: 01/19/2023

EPA Contract No.: 68H0519Q0005

TO: TOLIN: F0032-0001DL101

Coordinate System: WGS 1984
Datum: D 1984
Units: Degrees

C:\Users\JORDAN.EDWARDS\Documents\10050\Projects\Nelson Knitting Removal\Nelson Knitting Removal.aprx

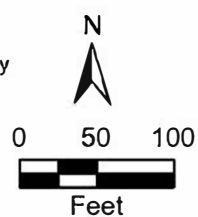


Reference Map



Legend

Approximate Site Boundary



Source: Google Earth

Nelson Knitting Site - RV
909 South Main Street
Rockford, Winnebago County, Illinois

Figure 2 Site Layout Map



Prepared For: US EPA

Prepared By: Tetra Tech, Inc.

Coordinate System: WGS 1984
Datum: D 1984
Units: Degrees

Hospital Route Map

← from 909 S Main St, Rockford, IL 61101
to SwedishAmerican Hospital

6 min (1.9 miles)

via S Main St

Fastest route now due to traffic conditions



909 S Main St

Rockford, IL 61101

- Take S Main St to Chestnut St
2 min (0.6 mi)
- Take Walnut St and 1st Ave to Swedish American Hospital
3 min (1.2 mi)
- Continue on Swedish American Hospital to your destination
1 min (0.1 mi)

SwedishAmerican Hospital

1401 E State St, Rockford, IL 61104

